

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

JACINDA GARDNER, individually and on behalf)		
of all others similarly situated,)		
)	
Plaintiff,)		Case No. 2:13-cv-03399-BHH
)	
v.)		
)	
COUNTRY CLUB, INC., d/b/a MASTERS)		
GENTLEMEN’S CLUB,)		
)	
Defendant.)		

**PLAINTIFF’S UNOPPOSED MOTION
FOR AWARD OF ATTORNEY FEES, EXPENSES, AND SERVICE PAYMENTS**

Plaintiff Jacinda Gardner moves under Rule 23(h) for an award of attorneys’ fees in the amount of \$500,000, reimbursement of litigation expenses in the amount of \$82,763.04, a \$10,000 service/incentive award to Plaintiff Jacinda Gardner, and \$2,500 service/incentive awards to each of the following Opt-in Plaintiffs who sat for depositions: Jessica Talbot, Leila Kurri, Stephanie DeBaggis, and Charlotte Smith. This motion is made in connection with the proposed class action settlement between Plaintiff Gardner Defendant Country Club, Inc. d/b/a Masters Gentlemen’s Club, which was preliminarily approved by the Court on February 8, 2019. As provided in the settlement agreement (ECF No. 190-3), Defendant has agreed not to oppose the relief sought in this motion.

In further support of this motion, a memorandum and declaration are being filed contemporaneously herewith. A proposed order incorporating the relief requested herein will be filed in conjunction with Plaintiff’s separate motion for final approval of the settlement.

Dated: May 6, 2019

Respectfully submitted,

/s/ T. Christopher Tuck

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Certificate of Service

I hereby certify that on May 6, 2019, the foregoing document was electronically filed using the Court's CM/ECF filing system, which will serve notice of the filing on counsel of record for all parties.

/s/ T. Christopher Tuck

T. Christopher Tuck